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USDOC FOR 532/OEA/MNICKSON /DMUSLU
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS
SINGAPORE FOR FCS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [ETRD](#) [ETTC](#) [HK](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: BESCOM COMPUTER
SYSTEMS PTE LTD

REF: A) USDOC 02452

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Regional Export Control Officer Philip Ankel (ECO) conducted a post shipment-verification (PSV) at Bescom Computer Systems Pte. Ltd., 8 Boon Lay Way, No. 08-09 Tradehub 21, Singapore 609964 (Bescom). The item in question is one Gimbal camera exported to Bescom on or about December 3, 2007 and valued at USD 17,346. The item is classified under Export Control Classification Number (ECCN) 6A004.D3 and is controlled for national security (NS) reasons. The exporter was Cloud Cap Technology of Hood River, Oregon.

13. According to the Singapore companies registry, Bescom was registered in 1991 and its registered share capital is the Singapore dollar equivalent of approximately USD 150,000. Its directors are Singapore citizens Yak, Hock Hwa, and Yak, Bee Hua. Yak, Bee Hua and Yak, Lay Hwa are also the shareholders of the company. It is a family business.

14. A review of the company's web site (www.bescom.com.sg) reveals that the company is primarily an IT systems integrator for corporate customers. It is also involved in import and export of hardware products in Southeast Asia.

15. On April 21, 2008, the ECO, accompanied by a representative of Singapore Customs visited the company and met with Mr. Yak, Hock Hwa, Managing Director. Mr. Yak confirmed that the company acts primarily as a system integrator and solutions provider. It sets up local area networks, file servers and other similar systems for corporate and government customers. It also acts as a sourcing agent for some government agencies (that cannot purchase direct from abroad but must deal with Singaporean companies in accordance with procurement rules). In addition, the company also sells internationally to other Southeast Asian countries such as Vietnam and China as well as the UAE (but not Iran, according to Mr. Yak). Customers from abroad come to the company because of its listing in certain export related trade publications. Additionally, when Bescom has stock that other local distributors cannot obtain quickly, those distributors (such as HP) may refer customers to them.

16. As to the particular item in question, Mr. Yak stated that this item had been procured on behalf of Nanyang Technological University in response to an RFQ from the University. Mr. Yak provided documentation confirming receipt of the item and delivery to the Main Aircraft Laboratory, School of Mechanical & Aerospace Engineering at the Nanyang Technological University. According to

Mr. Yak, Cloud Cap Technology is not a regular supplier.

17. At the time visited, Bescom appeared to be a suitable recipient of the commodities shipped since Bescom cooperated with the PSV, provided ECO with access to documents showing final disposition of the items and operates a line of business consistent with the use of the items. Also, Bescom was informed of applicable export control rules (especially those relating to reexports to sanctioned countries) and indicated its intent to comply with them.